

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
DONALD BEASLEY, Individually, and On	:	
Behalf of All Others Similarly Situated,	:	
	:	Electronically Filed
Plaintiff,	:	
	:	Civil Action No.: 1:08-cv-00913-LTS
v.	:	(ECF Case)
	:	
TELETECH HOLDINGS, INC., KENNETH D.	:	Hon. Laura Taylor Swain
TUCHMAN, JOHN R. TROKA, RUTH C.	:	
LIPPER, SHIRLEY YOUNG, WILLIAM A.	:	
LINNENBRINGER, JAMES E. BARLETT,	:	
SHRIKANT MEHTA, CITIGROUP GLOBAL	:	
MARKETS INC., MORGAN STANLEY &	:	
CO., INC., and ERNST & YOUNG, LLP,	:	
	:	
Defendants.	:	
-----	X	

(Additional Caption on the Following Page)

**MOTION OF THE NEW ORLEANS EMPLOYEES' RETIREMENT SYSTEM
FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF SELECTION OF LEAD COUNSEL**

-----	X	
WILLIAM BROWN, Individually, and On	:	
Behalf of All Others Similarly Situated,	:	
	:	Electronically Filed
Plaintiff,	:	
	:	Civil Action No.: 1:08-cv-01842-LTS
v.	:	(ECF Case)
	:	
TELETECH HOLDINGS, INC., KENNETH D.	:	Hon. Laura Taylor Swain
TUCHMAN, JOHN R. TROKA, JAMES E.	:	
BARLETT, RUTH C. LIPPER, WILLIAM A.	:	
LINNENBRINGER, SHRIKANT MEHTA,	:	
SHIRLEY YOUNG, CITIGROUP GLOBAL	:	
MARKETS INC., MORGAN STANLEY &	:	
CO., INC., MERRILL LYNCH & CO.,	:	
CREDIT SUISSE, and ERNST & YOUNG,	:	
LLP,	:	
	:	
Defendants.	:	
-----	X	

PLEASE TAKE NOTICE that class member the New Orleans Employees' Retirement System ("New Orleans") by its counsel, hereby move this Court for an Order: (i) consolidating the above-captioned actions; (ii) appointing New Orleans as lead plaintiff; (iii) approving New Orleans' selection of Labaton Sucharow LLP to serve as lead counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this motion, New Orleans submits herewith a Memorandum of Law and Declaration of Alan I. Ellman.

New Orleans is aware of the Court's Individual Practice 2.B., which requires a movant to use its best efforts to resolve informally the matters in controversy. The PSRLA specifies, however, that "any member of the purported class may move the court to serve as lead plaintiff" and specifies that motions for appointment as lead plaintiff are required to be filed no later than 60 days after the date the notice of action is first published. *See* 15 U.S.C. §§ 77z-1(a)(3)(A)(i)(II); 78u-4(a)(3)(A)(i)(II). In this case, the first notice of action was published on January 25, 2008, and the motions must, therefore, be filed no later than March 25, 2008. Given that "any member" of the class may submit a motion on this statutory deadline, it is impossible to know in advance which class members, if any, will be moving for appointment as lead plaintiff or opposing the instant motion and, therefore, impossible to confer with these class members prior to filing the motion. Accordingly, New Orleans respectfully requests that the Court accept the filing of this motion as mandated by the PSLRA.

Dated: March 25, 2008

Respectfully submitted,

LABATON SUCHAROW LLP

By: /s/ Christopher J. Keller
Christopher J. Keller (CK-2347)

Joseph A. Fonti (JF-3201)
Andrei V. Rado (AR-3724)
Alan I. Ellman (AE-7347)
140 Broadway
New York, New York 10005
Telephone: (212) 907-0700
Facsimile: (212) 818-0477

*Attorneys for New Orleans and Proposed
Lead Counsel for the Class*